

November 3, 2005

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: WC Docket 05-261 Ex Parte Presentation In Support of Fones4All Petition for Expedited Forbearance

Dear Ms. Dortch:

I am writing on behalf of The Sycamores ("Sycamores"). The Sycamores is a non-profit organization dedicated to the well being of children, adults and families. We are a behavioral health care organization accredited by the Joint Commission on Accreditation of Healthcare Organizations, and every year we provide services for more than 2,100 children, youth and adults in Los Angeles County. Since our founding as Pasadena's first orphanage in 1902, The Sycamores has been helping children and families build on their strengths. Originally our primary challenge was to provide a safe home for children whose parents were unable to support or care for them. Today, however urban life is more complex and extraordinary pressures are placed on ordinary families. To help children and families deal with societal pressures and challenges, The Sycamores has developed and expanded its services to include a broad array of social services, including providing vital information regarding the availability of social services to both long time residents and recent immigrants to the city of Pasadena.

In conjunction with Fones4All, one of the services that we advise our clients of is the availability of subsidized telephone service through both the California Universal Lifeline Telephone Service ("ULTS") Program as well as the support available through the Federal Lifeline and Linkup programs. Indeed, The Sycamores, in conjunction with Fones4All, has implemented innovative multi-faceted grass roots efforts recommended by the FCC¹—including door to door canvassing, targeted mailings, and on-site displays—to identify and serve households that did not previously have telephone service.

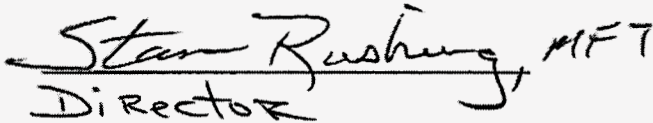
We agree with Commissioner Abernathy's statement in the *TracFone Order* that "it is essential that [the Commission] take all possible steps to ensure that low income consumers are not barred from using available support on the basis of the specific technologies they wish to use or the specific business plans pursued by their service providers."² However, without service providers like Fones4All, and other competitors

¹ See *Report and Order and Further Notice of Proposed Rulemaking*, WC Docket 03-109, FCC 04-87 at ¶¶45-46 (2004)

² See *In the Matter of Federal State Joint Board on Universal Service and Petition of TracFone Wireless, Inc. for Forbearance From 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i)*, Order, CC Docket 96-45, FCC 05-165 (Sept. 8, 2005)

who are currently using the combination of unbundled network elements known as "UNE-P" many of those clients of The Sycamores whose families are eligible for participation in the ULTS and/or the Lifeline program will in fact be barred from foreclosed from choosing to use the high quality services of Fones4All or any other similarly situated competitor purely because of the technology and business plan of the carrier. As a result, The Sycamores, and in fact all other ULTS and Lifeline eligible consumers will be foreclosed from having a choice of telecommunications carriers, and the negligible amount of competition for these customers will evaporate. Accordingly, The Sycamores urges the Commission to grant Fones4All's petition, and in so doing help ensure that low income consumers are afforded the competitive choices available to all other Americans.

Respectfully submitted,

 MFT
Director

cc: Chairman Kevin J. Martin
Commissioner Abernathy
Commissioner Adelstein
Commissioner Copps
Michelle Carey
Russ Hanser
Scott Bergmann
Jessica Rosenworcel